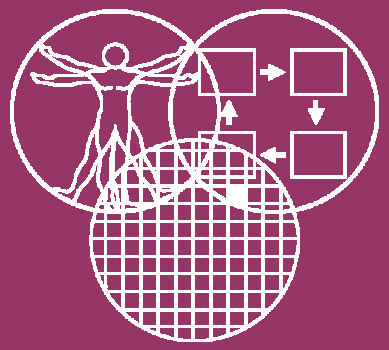

NewPoint Group®
Management Consultants

California Department of Pesticide Regulation

Virtual Service Delivery Environment

Business Process Improvement Opportunities and E-Government Candidates

Volume II – Appendices

March 30, 2001

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List of Stakeholders Contacted

Appendix A

County Agricultural Commissioners

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Agricultural Commissioner
County of Sacramento

Theodore ("Ted") K. Davis
Agricultural Commissioner
County of Kern

Eric Laurentzen
Agricultural Commissioner
County of Monterey

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Deputy Agricultural Commissioner
County of Kern

Marsha Palmer
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County of San Luis Obispo

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Gordon Sweeny
Systems Coordinator
County of Stanislaus

David R. Whitmer
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County of Napa

Agricultural Organizations

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California Farm Bureau Federation

Hank Giclas
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Western Growers Association

Richard Matoian
President
California Grape & Tree Fruit League

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Bill Thomas
Attorney
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Pesticide Registrant Organizations

Kati Z. Buehler
Director Environmental/Regulatory Affairs
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Steve Forsberg
President/CEO
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Stephen Kellner
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Consumer Specialty Products Association
[several registrants submitted comments]

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Kimberly A. Crum
Executive Director
California Agricultural Production
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Judy Letterman
Executive Director
Pest Applicators Professional Association

Environmental Organizations

David Chatfield
Director
Californians for Pesticide Reform

Anne Katten
Pesticide & Farm Worker Safety Project
California Rural Legal Assistance Foundation

Susan Kegley
Staff Scientist
Pesticide Action Network

Pete Price
Legislative Advocate
California League of Conservation Voters

Government Agencies

Pam Cooper
Chief, Pesticide Section
U.S. Environmental Protection Agency, Region 9

Karen Heisler
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U.S. Environmental Protection Agency, Region 9

Val F. Siebal
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Office of Environmental Health
Hazard Assessment

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Observation	Today's Performance	Gap	Improvement Opportunities
1. Long timeframes to register products	❑ During 2000, the median time taken by the DPR to register a new active ingredient was 393 days, up from 107 days the year before. ❑ During 2000, the median time taken by the DPR to register a new product was 53 days, down from 64 days the year before. ❑ During 2000, the average time taken by the DPR to register a concurrent product was 287 days, up from 224 days the year before. ❑ During 2000, the average number of days that a submission spent at two of the seven scientific workstations increased over 1999 timeframes, remained the same at a third workstation, and declined at the remaining four. ❑ The average days spent at three of the seven workstations exceeded 40 days. ❑ Medical Toxicology made significant improvements in turnaround of registration evaluations. This has not been the case for other scientific disciplines. ❑ Backlogs at most workstations declined during 2000, primarily because 25 Registration Branch positions were filled. ❑ Throughput (the total number of actions taken by the DPR) increased by 51 percent in 2000 over prior year levels. ❑ Approximately 50 percent of registration specialists' time (or approximately 15 PYs) is spent comparing product labels. ❑ Transfer of submissions between branches is not always well documented or confirmed, resulting in delays processing a submission. ❑ The product label database is updated and available the day after a product is registered.		P1. Eliminate scientific data evaluations that are beyond the scope of the scientific discipline P2. Ask the U.S. EPA and the registrant to provide a copy of every completed U.S. EPA data evaluation report, and eliminate data evaluations already completed by the U.S. EPA P3. Increase the number of requests to the U.S. EPA to expedite minor product label changes identified by the DPR during the registration process P4. Expand the number of products that, under specified conditions, can be registered without evaluation of scientific data P5. Post the 30-day public notice earlier in process (at the time a submission enters evaluation) P6. Form a workgroup and determine which internationally adopted templates that the DPR will adopt for submission of data P7. Ask the U.S. EPA and the registrant to provide a copy of every completed U.S. EPA efficacy data evaluation report for antimicrobial products being reviewed by the DPR P8. Provide to the registrant any DPR product as soon as it is being used for DPR decision making

Observation	Today's Performance	Gap	Improvement Opportunities
1. (continued)	❑ Registration Branch processes and technology architecture have been improved to support publishing, subscribing, and viewing content on the Intranet. ❑ Evaluation reports are not readily available or searchable on the DPR's Intranet. ❑ The DPR has not pursued waiver of efficacy data submission and evaluation of antimicrobial products as allowed by Senate Bill 464, 1997.		EG1. Prove concept of submitting and processing a product label electronically EG2. Prove concept of submitting and processing the entire registration submission
2. Less than optimal information available to manage process and ensure accountability	❑ All cycle time metrics generated by the tracking system include work and hold times, distorting the reported statistics and making it more difficult to manage the process. ❑ The DPR does not know the actual hours spent on each registration activity (e.g., preparing an evaluation report or reviewing a product label). Without this information, it is difficult to develop reliable workload statistics or estimates of the hours needed to review each submission, and to reliably predict for a registrant when DPR's evaluation of a submission will be completed. ❑ The DPR does not have accurate information to manage assignments, determine an evaluator's availability, provide information needed to forecast when the DPR will complete its evaluation of a specific submission, or defend upgrades to the 20-year old statutory turnaround requirements. ❑ The median time to issue a license (the DPR's publicly reported measure) is not normalized to account for the mix of different types of submittals. ❑ Barriers exist between the branches that slow down registration evaluations. These include inconsistent policies and priorities among the branches, lack of succinct guidelines for the process, branch chiefs operating relatively autonomously, duplicate databases and logs, and, on occasion, redundant reviews of the same data. ❑ Assistant Directors may not sufficiently exercise their authority to resolve all registration issues.		P9. Organize and charter a team to identify process and database changes necessary to capture the actual time spent on evaluating submissions and improve existing performance measures

Observation	Today's Performance	Gap	Improvement Opportunities
3. Considerable number of incomplete submissions	❑ Fifty percent of submissions are returned due to incomplete application or data. Of those returned, approximately 30 percent are done so because the application form is incomplete (Jan 1997 est.). ❑ The DPR may take several weeks before letting a registrant know that their submission is incomplete, many times for only minor administrative issues. ❑ Approximately 25 percent of registration specialists' time is spent working with a registrant to fill out the application and navigate through the review process. ❑ Over last several years, staff have consolidated and improved the procedures manual.		P10. Provide more specific written instructions and workshops to the regulated community P11. Complete current efforts to evaluate the benefits, organization, and required system modifications of a consolidated screening function EG3. Provide Internet access to materials that will help registrants through all aspects of registering products EG4. Allow registrants to complete and submit a product registration application form online
4. Some difficulty gaining access to valuable information	❑ Registrants would like to obtain any evaluation report as soon as the DPR is using it to make decisions. ❑ Evaluation reports are not easily available or searchable. ❑ Public record requests consume unnecessary staff resources to conduct manual searches, retrieve from a storage location(s), copy, assemble, log, and mail. ❑ Department branches involved with evaluating scientific data are not always included in discussions of final decisions, and are not always provided copies of other workstation evaluation reports that directly impact how their own evaluation report is written or modified. ❑ The DPR maintains the pesticide data index to efficiently manage the storage and retrieval of thousands of scientific data studies. This database, and a like database from U.S. EPA (PDMS) comprise the largest sets of pesticide data in the world. Placing it on the Internet is a high priority of the department, due to the high demand for this information.		P12. Obtain a legal opinion to determine which public reports must be prepared and when a registration work product becomes a public record P13. Link documents by the industry standard already in use at the DPR: the chemical code EG5. Provide secure Web access to pesticide registration reports EG6. Provide Internet access to pesticide index and chemical information databases

Observation	Today's Performance	Gap	Improvement Opportunities
4. (continued)	❑ The DPR maintains the chemical information database to efficiently locate regulatory information on chemical ingredients. It is extremely useful to DPR staff to identify the status of a chemical (e.g., registration status, regulatory information/reports, number of actively registered products containing the chemical). Potential exists to use this database to identify all reports prepared by DPR that are relevant to a chemical, and whether any DPR branch is doing something regarding the chemical (e.g., reevaluation by WH&S, pest management study).		
5. Unnecessary workloads and time delays to renew product licenses	❑ During 2000, the average time taken by the DPR to renew a license was 38 days, up from 29 days the year before. The actual DPR staff time spent working on each license is approximately 40 minutes. ❑ Renewing every product license every year unnecessarily increases both registrant and DPR workloads. ❑ Many activities performed to renew product licenses are unnecessary and add no value to the registrant and cause the renewal process to be longer than necessary and consume staff resources unnecessarily. ❑ Up-to-date information about each registrant and their products is not always available, causing workarounds and unnecessary activities to complete license renewals. ❑ The DPR prints and separately files three copies of every product license (registration, label resource center, and enforcement). The DPR handwrites changes on one of these hardcopy licenses to maintain current information. The DPR does not keep the other two copies up-to-date.		P14. Extend registration period from one year to two years P15. Eliminate any licensing renewal activity that does not add value to the registrant EG7. Allow registrants to renew product licenses on the Internet EG8. Develop the capability to display the image of the current product license on DPR's external website

Observation	Today's Performance	Gap	Improvement Opportunities
6. Unclear priorities for processing submissions	❑ Registrants are not always provided with a clear description of how the DPR prioritizes submissions for review and evaluation. ❑ Registrants are not always provided clear information on either of their primary information needs: (1) where a submission is in process, and (2) when the DPR will make its final decision. ❑ Process throughput (i.e., number of DPR final actions) can be increased with statistically proven techniques for selecting submissions waiting to be processed. Management already implicitly encourages this technique be used. ❑ Time frames first established in regulations by the CDFA in 1981 (60 and 120 days) are unrealistic, given the volume of data submitted in response to more recent Legislative requirements (SB 950 and AB 2021). ❑ Assistant Directors appear to be more focused on serving the Director's Office rather than focused on branch operations. Effects of this have been operating issues that go unresolved for years, internal conflicts on priorities, duplication of work, and errors.		P16. Confirm and publish the basis for selecting the next submission that is waiting to be processed P17. Establish and publish the DPR's goal for the number of days to process a submission
7. Duplicative tracking systems	❑ The DPR will enter the same tracking information for a registration submission in three different tracking databases, unnecessarily consuming program and IT support staff resources.		P18. Eliminate registration tracking systems now used by the Medical Toxicology Branch and the Worker Health and Safety Branch
8. Misleading product label database information	❑ The product label database does not correctly reflect what is actually on the label. The primary difference between the label and the database is the list of crops for which a product is registered. Other data issues include the incorrect pre-harvest and reentry interval values on in the database. ❑ One primary cause of the difference in crops listed is the DPR adding codes for additional crops that do not appear on a registered product's label in order to accommodate pesticide use reporting needs.		P19. Identify primary data corruption issues and root causes of product label database data errors, then develop and implement a plan to address the highest priority issues

Observation	Today's Performance	Gap	Improvement Opportunities
9. Late license renewals	❑ Licensees for approximately 280 products (of 11,500 registered) were renewed late in 2000, a very low number. ❑ Late fees are minimal, providing little or no incentive for registrants to renew on time. ❑ Late renewals take DPR staff more time to process than on-time renewals (ties up all renewals, causes consumer phone calls about products for sale that are not registered). ❑ Statutes do not allow the DPR to collect mill tax on a non-registered product, even though sales may occur, resulting in a loss of DPR revenues.		P20. Evaluate late fees to make commensurate with impact on the DPR (increased staff time, lost mill assessments)
10. Software applications and database	❑ A number of upgrades and improvements to applications and databases are required that would help staff deliver services and information more efficiently and effectively. These include modifications already documented by the DPR and those identified during the preparation of this report. ❑ It is difficult, if not impossible, to search for and identify registered products that can be used to control a specific pest or pest/site combination. The primary reason is that the specific pests controlled by a product are not captured by the DPR. ❑ Licensing renewal staff perform a number of unnecessary activities (refer to Appendix D for examples) that could be reduced or eliminated with improvements to the supporting databases.		IT1. Develop and implement a project plan (tasks, resources, schedule, and responsibilities) to upgrade databases that support registration from Oracle 7.3.4 to Oracle 8 and to make other identified improvements IT2. Obtain an electronic copy of U.S. EPA's list of pests and populate the DPR product label database with this list, for those registered products with matching U.S. EPA registration number IT3. Make modifications to the registrant/firm and the licensing/renewal databases to support staff research and license renewal efforts

Observation	Today's Performance	Gap	Improvement Opportunities
1. Long timeframes to license individuals and businesses and approve continuing education courses	❑ During 2000, the average time taken by the DPR to issue a new agricultural pest control advisor (APCA) license was 50 days, up from 43 days the year before. ❑ During 2000, the average time taken by the DPR to issue a new qualified applicator license (QAL) was 45 days, up from 43 days the year before. ❑ During 2000, the average time taken by the DPR to issue a new pest control aircraft pilot (PCP) certificate was 38 days, down from 42 days the year before. ❑ During 2000, the average time taken by the DPR to renew an agricultural PCA license was 11, days, up from 5 days the year before. ❑ The actual time spent by DPR staff renewing a license may be 30 to 40 minutes, and could be as little as five minutes. However, it takes up to 50 days to mail the renewed license to the licensee. ❑ During 2000, the average time taken by the DPR to accredit a continuing education course was 17 days, up from 10 days the year before. The actual DPR staff time spent working on a continuing education application is approximately 60 minutes. ❑ Staff workload on renewals concentrated between October and December of each year (to complete renewal processing by December 31) creates unnecessary bottlenecks that delay renewals and submission reviews. This peak workload also unnecessarily causes stress on staff. ❑ Applicants must print hard copies of applications and mail them to DPR. ❑ The new embossing machine was purchased approximately two years ago, but the DPR delayed installing it in February 2001. Staff have not determined whether this is a networking issue (internally within DPR), a software issue, and/or an issue with the embossing machine technology.		P1. Determine whether assigning staff to all license types is more efficient than assigning staff to one license type P2. Stagger license and certificate renewals throughout the year P3. Extend the current license and certificate renewal period from two years to three years P4. Replace the old license and certificate card embosser with a new embosser already purchased by the DPR P5. Use existing performance measures with more precise cycle time definitions and data captured by the core database EG1. Allow license and certificate holders to renew licenses and certificates on the Internet EG2. Allow users to complete and submit continuing education sponsorship requests on the Internet EG3. Allow applicants to complete and submit a license and certificate application form on the Internet

Observation	Today's Performance	Gap	Improvement Opportunities
2. Less than optimal process for examinations	❑ DPR staff proctors examinations throughout the year and throughout the State, though not legislatively mandated to do so. DPR staff must travel and plan their work around these proctoring efforts. ❑ One DPR staff person cannot effectively proctor an examination with up to 50 people present. ❑ Scheduling examinations is a manual function that frequently results in errors (e.g., too many examinees show up to a location). ❑ No examinations are scheduled between October and December because staff are renewing licenses and certificates during this period.		P6. Evaluate alternative sources to proctor licensing and certificate examinations P7. Replace the old Scantron machine with a new Scantron machine already purchased by the DPR EG4. Evaluate whether to allow applicants to take licensing and certification examinations on the Internet EG5. Evaluate whether to develop remote kiosks that applicants can use to take licensing and certification examinations
3. Some difficulty gaining access to valuable information	❑ Staff spend an inordinate amount of time on the telephone responding to customer inquiries (up to 40 percent of their time for some program technicians). ❑ Existing applications and forms are out-dated (e.g., due dates and DPR address are incorrect). ❑ Applicants are required to provide redundant information on multiple applications. ❑ Licensing and certification information on the website could be organized better and more interactive for stakeholders. ❑ Enforcement staff in the field cannot quickly assess information on a current licensee or certificate holder. ❑ Applicants frequently are confused about when to renew licenses/certificates and about the amount of fees due. Many applicants call DPR staff to clarify the biannual renewal process. ❑ The current listing of license/certificate holders does not contain all information that stakeholders would like (e.g., address, telephone number, license category, aerial/non-aerial).		P8. Provide licensing and certification staff with specific training to improve customer service P9. Develop and implement a plan (tasks, resources, schedule, and responsibilities) to update applications and forms EG6. Improve stakeholder access to study guides and materials (including text books) needed for examinations EG7. Provide Internet access to materials that will help stakeholders through all aspects of licensing and certification EG8. Provide Intranet access to materials that will help DPR provide stakeholders with improved customer service, including online access to improved listing of licensees and certificate holders

Observation	Today's Performance	Gap	Improvement Opportunities
3. ***(continued)***			EG9. Evaluate bar coding licenses and certificates for greater access to current licensing and certification information
4. **Outdated examinations and study guides**	❑ Current examination content is not reflective of: • Changes in pesticide products, application requirements, and mitigation measures specific to the product and soil type • New DPR programs (e.g., surface water, ground water, and air quality standards) • Environmental monitoring • Recent U.S. EPA decisions • Current pesticide application practices. Examination categories are not specific enough to reflect current practices. Examination questions do not require applicants to study specific-enough content related to their field, potentially resulting in compliance problems. ❑ Examination topics and questions have not been updated to reflect changes in pesticide practices since 1985. ❑ Study guides are not aligned with the content of examinations for all types, with the exception of advisor license examinations. ❑ Examination categories are not specific enough to reflect current pesticide application practices.		P10. Update examinations and study guides to reflect current pesticide practices P11. Periodically compare license and certificate holder violations with examination results and continuous education courses taken
5. **Software applications and database**	❑ A number of upgrades and improvements to applications and databases are required that would help staff deliver services and information more efficiently and effectively. These include modifications already documented by the DPR and those identified during the preparation of this report.		IT1. Correct documented problems with the licensing and certification core database IT2. Prepare system and user documentation of applications and databases

Observation	Today's Performance	Gap	Improvement Opportunities
5. ***(continued)***	❑ Licensing staff perform a number of unnecessary activities that could be reduced or eliminated with improvements to the supporting databases, including: • Scheduling an applicant's attendance at examinations by hand writing each entry into a notebook • Generating continuing education course numbers manually • Answering inquiries from licensees who were mailed a renewal notice when they should not have been mailed one • Reviewing hardcopy sources to determine the status of a license because the core database is inaccurate • Answering inquiries regarding the reliability of current licensee status information. ❑ The core database contains errors (e.g., formulas for some fields are incorrect). ❑ Cycle times for permit reform act reporting are captured separate from the licensing and certification databases in a Microsoft Excel spreadsheet, and may not capture all relevant or correct data. The effect is a report to the Legislature that may be inaccurate. ❑ None of the licensing and certification databases are accessible by non-licensing and certification program staff.		IT3. Use the core database and the statistics databases to capture permit reform act cycle time data and prepare required reports IT4. Create the capability to automatically print various letters from existing licensing and certification databases

Observation	Today's Performance	Gap	Improvement Opportunities
1. Less than adequate evaluation of CAC	❑ Effectiveness evaluations do not adequately measure the overall performance of the CACs. Effectiveness evaluation forms are boilerplate forms with little opportunity to provide anything more than activity counts. ❑ Regional office staff maintain contradictory roles as: (1) a liaison to the CAC necessitating relationship building, and (2) an independent and objective evaluator of the CAC's performance through the effectiveness evaluation. Regional office staff often must compromise one of these two roles. ❑ Draft versions of effectiveness evaluations are regularly changed based on comments provided by CACs, often diluting the original intent of the evaluation. ❑ Changes to effectiveness evaluation content require nearly full support from the CACs and its association (CACASA), restricting the ability for the DPR to develop a meaningful effectiveness evaluation. ❑ The DPR provides a CAC one year to take corrective actions noted through an effectiveness evaluation. However the implications to the CAC for not taking corrective action following one year have not been determined by the DPR. ❑ Effectiveness evaluations are forwarded to headquarters, where some are placed in a file drawer. No one is responsible for maintaining and updating a complete file system of effectiveness evaluations.		P1. Develop and implement a project plan (tasks, resources, schedule, and responsibilities) to implement the *Enforcement Initiative* P2. Evaluate whether to create an enforcement audit group within enforcement to conduct independent effectiveness evaluations of all CACs, rather than have regional office staff evaluate CACs in their region P3. Evaluate whether to develop a formula for allocating the mill to CACs that is more closely tied to performance
2. Long time to capture and report enforcement data and reports	❑ Regulatory activities data are entered up to four times (by CACs, enforcement staff, mill staff, and accounting staff). ❑ Data entry errors result from staff interpreting hand written forms completed by enforcement staff in the field (e.g., CDFA laboratory staff entering market surveillance program data and headquarters staff entering both the market surveillance and product compliance program data).		P4. Adopt performance measures for the permitting and enforcement process EG1. Allow CACs to submit regulatory activities summary reports electronically EG2. Use hand held electronic devices to record market surveillance program data in the field

Observation	Today's Performance	Gap	Improvement Opportunities
2. ***(continued)***	❑ There are no formal performance measures for the enforcement process, so it is difficult to manage the effectiveness or efficiency of this process. ❑ Below are the most recent versions on the DPR website of three required enforcement reports: • Residues in fresh produce report (1997) • CAC civil penalty report (1996/97) • Pesticide regulatory activities summary report (1998/99).		EG3. Use hand held electronic devices for the product compliance program
3. Less than optimal management of investigations	❑ DPR enforcement staff have less than adequate investigative training. ❑ Pesticide enforcement staff (including regional office staff) are not always considered an extension of the DPR director when dealing with CACs. Pesticide enforcement staff (including regional office staff) roles are not clearly identified to the CACs. ❑ The DPR does not have a uniform investigation process. As a result, regional office staff do not conduct investigations uniformly. ❑ Regional office staff do not follow a uniform investigation process, and the DPR has not adopted standards for the investigation process. ❑ The process for capturing information on investigations is inconsistent throughout the DPR. ❑ In-process decisions and information on aspects of an ongoing investigation are provided to stakeholders prior to completing the investigation, potentially undermining the investigative process. ❑ Several different references used by the DPR for investigation numbers causes confusion (e.g., priority investigation number, complaint form number, and t-case number).		P5. Develop standards for managing investigation cases P6. Develop a method for identifying a DPR versus a CAC investigation P7. Manage expectations of stakeholder on investigation status and information P8. Provide regional office staff more decision-making authority on enforcement actions P9. Reinforce safety in investigation work

Observation	Today's Performance	Gap	Improvement Opportunities
4. Resources spent on activities not required in law	❑ The DPR reviews approximately 600 Notices of Proposed Actions (NOPAs) per year prepared by CACs for format, content, and appropriateness, although not required to in statute or regulation. The DPR performs these reviews primarily to identify cases they may wish to undertake (about two to three per year), and to ensure that "notice" and due process issues are addressed. ❑ The product compliance program is not legislatively required. The DPR does not prepare a report for this program. ❑ Enforcement staff develops general permit conditions for specific pesticides (examples include metam- sodium, methyl bromide, and 1,3-D). This activity represents approximately seven PYs of enforcement staff time (three regional office PYs and four headquarter PYs). The seven PYs do not include time spent by the Enforcement Monitoring Branch (approximately four PYs), the executive branch, and the CACs. ❑ By writing general permit conditions for a few pesticides, the DPR subsidizes the registrants of these few pesticides with mill payments from other non-resource intensive registrants. This subsidy creates an unfair economic advantage for these registrants.		P10. Eliminate review of CAC notice of proposed actions (NOPAs) P11. Consider eliminating state funded product compliance program activities P12. Evaluate whether DPR staff should continue to write general permit conditions for non-enforcement or non-CEQA issues P13. Increase the mill charged to registrants who necessitate the DPR writing general permit conditions for non-enforcement or non-CEQA issues
5. Some difficulty gaining access to valuable information	❑ Multiple types of letters exist that provide department policy (e.g., policy/procedure letters, enforcement letters, CAC letters, executive letters, legal letters). ❑ The DPR has electronic versions (or "soft copies") of enforcement letters for the past five years, but provide Internet access to only year 2000 and some 1999 letters. ❑ Enforcement letters are distributed to CACs through the U.S. mail, facsimile, and the DPR website, and in person at regional offices. However, several CACs and CAC staff claim that they do not get copies of these letters. ❑ The DPR is not regularly e-mailing CACs (including staff) new enforcement letters.		P14. Develop and adopt a standard, department-wide name, format, and numbering sequence for all policy/procedure letters P15. Evaluate whether to update the existing enforcement policy and procedures manual to reflect current DPR policies P16. Improve the quality and presentation of training and outreach materials

Observation	Today's Performance	Gap	Improvement Opportunities
5. ***(continued)***	❑ New enforcement letters can contain policy and procedure information already provided in a previous enforcement letter(s). ❑ Negotiated work plans, effectiveness evaluations, and compliance assessments are not available to the public. ❑ Training packages are outdated and not readily available to all enforcement staff and CACs. ❑ Outreach products are created in an ad hoc way with no uniformity across the DPR. ❑ Staff at regional offices travel long distances to coordinate work on training materials.		EG4. Provide greater Internet access to, and search capability for, enforcement letters EG5. Provide Internet access to relevant enforcement documents and materials EG6. Provide Internet access to answers that stakeholders often ask EG7. Provide CACs an online forum to share information on administrative civil penalty cases EG8. Provide CACs secure Internet access to notices of final decision (NOFDs) EG9. Provide Internet access to pesticide residue data
6. Potential for lower cost operations	❑ The DPR has not compared CDFA laboratory fees with fees charged by other laboratories for comparable services and performance.		P17. Compare CDFA laboratory fees with fees of other companies providing the same services
7. Software applications and database	❑ A number of upgrades and improvements to applications and databases are required that would help staff deliver services and information more efficiently and effectively. These include modifications already documented by the DPR and those identified during the preparation of this report. ❑ The enforcement and compliance action tracking application and database does not: • Provide a field for an investigation number or tracking number (providing linkage back to NOPA/NOFD) • Accommodate new DPR administrative civil penalties (for users of materials). ❑ Include data from 15 types of DPR administrative civil penalties for other than "users of materials" (e.g., mill assessment, unregistered products, licensing actions).		IT1. Improve capabilities of the enforcement and compliance action tracking database IT2. Allow regional office field staff to either submit electronic data, or populate the product compliance database and the residue databases directly, rather than providing hard copies to headquarters for data entry

Observation	Today's Performance	Gap	Improvement Opportunities
1. Long time frames to receive and publish pesticide use data	❑ The DPR has not yet published the final 1999 use data. ❑ Not all counties submit required data each month, and the DPR does not establish any turnaround time for counties to submit PUR data. Some counties provided the DPR with final 1999 use reports in December 2000. ❑ County and DPR resources are unnecessarily consumed with investigating and resolving use data errors. After receiving use data from the counties, the DPR performs 52 different validations to determine if any errors exist in the data. Trapping errors so late in the process prevents counties from investigating and correcting an error when memories are still fresh and the original hardcopy use report is easily accessible. Use reports with unresolved errors decrease the number of use reports captured in the statewide PUR database. ❑ Counties are not always allowed by the county DataFlex software to capture the actual crop treated as recorded on the use reports. ❑ Returning hardcopy error reports to counties in a timely manner has been difficult for DPR for some time, although DPR made significant reductions in turnaround during the last half of 2000. Causes for the delay include the following: • During the project to convert the PUR database to Oracle, all the programmers and database administrators left and no one was hired to replace them • A DPR entomologist completed the database conversion. This scientist has no formal computer training and has full-time scientific program responsibilities • A student intern who is still learning SQL is doing some of this critical work. ❑ Use reports from counties contain anomalies that must be manually checked and corrected (e.g., blank spaces at the end of a record, different control characters than expected by DPR applications, file structure errors). ❑ Turnover of county data entry to other IT support and program positions requires increased training efforts from the DPR.		P1. Maximize the number of required validation checks of PUR data within any application used by a county to capture use reports P2. Modify county contracts to require that counties submit all PUR data received during the prior month within 20 days (or a "reasonable time frame") of the end of the prior month P3. Eliminate reporting of non-agricultural pesticides P4. Provide more specific written instructions and workshops to pesticide users and counties EG1. Provide Web-enabled access to electronic filing of use report data EG2. Provide a means for end users to query the PUR database locally, using the same tools as will be provided with the Internet-based pesticide resource directory

Observation	Today's Performance	Gap	Improvement Opportunities
2. Low error rates	❑ After corrections, approximately one-half of one percent of the use reports submitted to the DPR by counties have errors, a very low rate. This low error rate excludes possible duplicates records. ❑ The most frequent, critical error in use data from counties is a commodity listed on the use report that does not match a commodity listed on the product label database. ❑ The second most frequent, critical error in PUR data from counties is a use rate that exceeds normal ranges of use (i.e., is an outlier). ❑ A minor number (10 to 20) of all PURs (2.5 million per year) show that a pesticide was illegally applied to a crop not listed on the product label. ❑ The potentially largest source of errors is unreported use. The DPR and the counties have estimated that as much as 30 percent of pesticide use goes unreported. Counties submitted 2.6 million records in 1999, the most recent year available.		P5. Formalize a process to allow individuals to report possible errors in PUR data and track the resolution of these reports P6. Formalize an on-going effort to utilize mill assessment, product label, and PUR information to determine potential pesticide use that goes unreported
3. Difficult data integrity issues	❑ Assignment of operator and site identification codes among counties is inconsistent, making it difficult to ultimately build queries of PUR database using grower and site identifying codes. ❑ Inconsistent agricultural fields account for 88 percent of all data "errors" found by DPR data validation routines. However, this error is not reported to the county, in part because there are so many of them, and because the error has to do with the problems in how agricultural fields are defined in the PUR, not necessarily errors in data entry. The new programs and procedures being developed by the GIS group should solve most of the problems that generate this error. ❑ The DPR has not yet followed through with all initiatives developed by the geographic information (GIS) developers' group. GIS group participants have expended significant effort on this and other coding issues.		P7. Review GIS developers' group recommendations for identifying field sites and incorporate required modifications into regulations

Observation	Today's Performance	Gap	Improvement Opportunities
3. (continued)	❑ The Internet-based pesticide resource directory project will need help from the Environmental Systems Research Institute, Inc. (ESRI) to develop GIS needs and to structure and size equipment.		
4. Difficult data presentation issues	❑ Pesticide use data query capabilities are not available on DPR's Intranet nor the Internet. Reasons for not allowing access include DPR concerns with: (1) setting expectations of the public, (2) slowing down the PUR server, (3) providing reasonable response times over slower modem connections, and (4) interpreting (or misinterpreting) PUR fields and query results. ❑ The DPR provides the full database on CD ROM. ❑ The DPR responds to approximately 250 public requests each year for specialized PUR database queries, consuming staff resources. Staff responds to a good portion of these requests by querying the PUR database with the same tool that could be used by the public: an Internet browser.		P8. Strengthen the relationship with the University of California Statewide Integrated Pest Management Project, including more frequent updates of PUR data throughout the year EG3. Provide a daily extract of the product label database on DPR's website for downloading by counties
5. Unclear process management	❑ The DPR has not assigned responsibility and authority for the PUR process to a single position. ❑ A number of key decisions are not being made about PUR policies and practices, including converting a software application that is necessary to publish PUR data for 1999, and determining what types of data errors should be accepted or rejected in the PUR database. ❑ Support for DPR's Oracle platform for use reporting is insufficient. Positions providing PUR IT support are either vacant, filled with a program scientist, located in a different branch, or not authorized. ❑ No direct technical leadership is provided to all 25 authorized IT positions within the enforcement division, and on-going application maintenance and enhancement are not always performed (including required modifications to the PUR applications and database).		P9. Assign a single position the authority and responsibility for PUR transaction and reporting functions P10. Place all Division of Enforcement, Environmental Monitoring, and Licensing IT positions under direct supervision of a single information technology position

Observation	Today's Performance	Gap	Improvement Opportunities
5. (continued)	❑ Reorganization of the ITB in 1998 assigned responsibility for maintaining the PUR database to (what is now) the Pest Management and Licensing Branch, but failed to transfer the existing IT positions to do so. ❑ In May 2000, the DPR held a conference on pesticide use reporting. At this conference, the DPR collected and compiled a list of issues that users of the data had identified. The DPR indicated that it would respond to those issues. The DPR has not yet prepared a formal response, and does not have a lead person or staff working on a response or resolving the issues.		
6. Non-standard applications and difficult support environment	❑ The DPR has not assigned a programmer to the DataFlex application in five years, so no upgrades or modifications have been made to this county application during that time. The only modifications made are in response to county "emergency" requests for application repairs. ❑ The county DataFlex applications are decaying because of a lack of sufficient support. Neither counties nor the DPR have documented baseline needs or prepared plans to make basic repairs to the DataFlex application. ❑ The DataFlex application exists in multiple versions across the state, runs on a DOS platform, and is frequently loaded by counties on individual workstations (e.g., PCs). These characteristics prevent easy mass updates to the DataFlex application, reduces the level of support provided by the DPR, and increases DPR's cost to maintain application. An example of a mass update is adding a new field to the database. Non-standard applications also increase support requirements. ❑ Each county has unique definitions and procedures for PUR data entry. Effects of this include the following: • Validating data is more difficult because different error checking procedures are required for some counties		P11. Determine and then commit to a specified level of DataFlex support P12. Evaluate the feasibility of deploying a county-developed permitting and use reporting system to all counties P13. Evaluate the feasibility of deploying the Kern County GIS application to all counties

Observation	Today's Performance	Gap	Improvement Opportunities
6. (continued)	• Analyzing PUR for trends and patterns is more difficult or impossible. One example: To identify agricultural fields, the DPR needs to use the grower ID and site location ID. However, many different rules and procedures exist among the counties for assigning values to these data fields, some of which affect how agricultural fields are identified. These inconsistencies effect calculations, such as acres planted and percent acres treated. ❑ The DPR has found it difficult and time consuming to determine what county definitions and procedures are. ❑ Growers and PCOs use multiple software applications with different record layouts to generate PURs. Not all growers with in-house systems, nor Crop Data Management Systems, Inc. (CDMS), have made modifications to their systems that would be necessary to generate PURs in the record layout required by county systems. One effect of this is that the same use data may now be key entered three times - by the grower, processor, and county.		
7. Mixed results from work groups	❑ The DPR has formed a number of work groups to improve the PUR process and data. However, results of efforts by group participants have been mixed, not from a lack of ideas but from a lack of follow-through, completion, and staff resources.		P14. Determine which work groups to form and retain, then prioritize and publish existing issues and recommendations to improve PUR process and data
8. Less than optimal information available to manage process and ensure accountability	❑ No formal performance measures exist. The DPR does not regularly capture, record, or regularly report any measures of the PUR process to management. As a result, it is difficult to evaluate the effectiveness or efficiency of this process. ❑ The DPR does not send customer satisfaction surveys to PUR stakeholders.		P15. Develop performance measures for the PUR process

Observation	Today's Performance	Gap	Improvement Opportunities
9. Software applications and database	❑ A number of upgrades and improvements to applications and databases are required that would help staff deliver services and information more efficiently and effectively. These include modifications already documented by the DPR and those identified during the preparation of this report. ❑ The DPR has partnered with counties to pilot a Windows-based application for issuing permits and reporting pesticide use. One key requirement will be to identify and prioritize enhancements to the pilot application that are needed by growers, PCOs, and counties. ❑ Insufficient documentation exists of operating procedures, systems/applications, and technical environment. Very good documentation exists for critical data validation and error messages.		IT1. Develop and implement a project plan (tasks, resources, schedule, and responsibilities) to upgrade PUR applications and database from Oracle 7.3.4 to Oracle 8 and to make other identified improvements IT2. Determine desired enhancements to a county-pilot for permitting and use reporting IT3. Prepare system and user documentation of all applications and the database

Mill Assessment Process

Observation	Today's Performance	Gap	Improvement Opportunities
1. Long timeframes to complete mill assessment process	❑ Mill assessment quarterly report forms are printed and mailed by the DPR to registrants, dealers, and brokers, who manually complete and mail them to the DPR. ❑ The mill policies and procedures manual is incomplete. ❑ Registrants, dealers, and brokers frequently submit forms with errors. Errors by the registrant, dealer, or broker in completing the mill assessment quarterly report form include: • Improperly identifying a unit other than pounds or gallons on the mill assessment quarterly report form • Aggregating sales of many registered products into one listed product rather than reporting sales of each individual product. ❑ Registrants, dealers, and brokers frequently question what products they should pay the mill assessment on. ❑ The DPR may mail mill assessment quarterly report forms to registrants for products not currently registered. The firm/registrant and licensing/renewal databases are the source used by mill assessment for registrant mailing addresses and registered products. When these databases are not updated to reflect inactivated products, the DPR may mail mill assessment forms incorrectly. ❑ The DPR is not clear on the policy of whether a registrant, dealer, or broker is required to pay the mill assessment on an unregistered product. Currently the DPR does not refund the mill assessment paid on unregistered products. ❑ There is no mill assessment information on the website.		P1. Provide additional instructions to the mill assessment quarterly report form P2. Develop a user's guide for how to use the mill assessment software application and database P3. Ensure that the database of currently registered products is up-to-date and clarify the definition for when a registered product becomes unregistered for failure to renew P4. Consider providing incentives for submitting *Mill Assessment Quarterly Report* forms prior to their due date to discourage concentration of returns mailed at deadline. EG1. Allow registrants, dealers, and brokers to submit a complete *Mill Assessment Quarterly Report* form online EG2. Provide Internet access to materials that will help registrants, dealers, and brokers through all aspects of completing the mill assessment quarterly report form EG3. Provide online access to answers that stakeholders often ask
2. Less than adequate compliance with mill assessment	❑ The DPR does not collect the entire mill assessment due from all registrants, dealers, and brokers. ❑ The DPR does not utilize all department-wide resources (including mill staff, legal, and audit) to ensure full compliance with mill assessments.		P5. Determine whether the DPR should more aggressively pursue complaints against those failing to comply with mill requirements

Observation	Today's Performance	Gap	Improvement Opportunities
2. ***(continued)***	❑ Penalties assessed on registrants, dealers, and brokers do not increase with the duration of the unpaid assessment. Some registrants, dealers, and brokers delay paying the mill because they know that the penalty is not time sensitive and is relatively small relative to the actual assessment due. ❑ There are no formal performance measures for the mill assessment process, so it is difficult to manage the effectiveness or efficiency of this process. ❑ Recently, the DPR performed a comparison of sales and use data that allowed the DPR to identify registrants who may not be paying mill for products used. As a result of this analysis, the DPR audited one registrant and collected over $3 million in unpaid mill fees.		P6. Modify the current 10 percent late penalty charged to registrants, dealers, and brokers so that the size of the penalty increases with time P7. Develop a process and toll-free number that allows an individual to contact the DPR with anonymous tips on registrants, dealers, or brokers who may not be paying the mill P8. Establish and publish the DPR's performance measures for the mill assessment process P9. Formalize an on-going effort to utilize mill assessment and pesticide use information to determine potential mill assessments that go unpaid P10. Develop and document a methodology for sampling companies to audit for mill assessment payments
3. Mill amounts recorded by accounting do not match amounts recorded in the mill assessment database	❑ Mill assessment data compiled by mill assessment staff do not match amounts recorded by accounting. Some of this discrepancy is due to timing differences. Accounting is recording information on a "cash basis" and mill assessment staff is recording information on an "accrual basis." Some of this discrepancy also is due to the timing of refunds and payments resulting from audits. ❑ Reports generated from the mill assessment database do not capture all necessary data. Mill staff currently cannot add all unregistered products to the mill assessment database.		P11. Create a process to reconcile mill amounts recorded by accounting with mill amounts entered in the mill assessment database

Observation	Today's Performance	Gap	Improvement Opportunities
4. Inadequate follow-up on problems with mill assessment payments	❑ Generating the *Mill Assessment Quarterly Reports* does not allow staff adequate time to properly follow-up on payment problems. Mill staff are unable to notify every registrant, dealer, and broker who returned forms with insufficient information. This can result in unpaid mill assessments for the prior quarter. ❑ There may be inadequate staff to support the mill assessment process, as currently designed. Currently, two and a half PYs are dedicated to the mill process. ❑ Problem letters have historically been prepared by administrative staff (up to 0.25 PY per year) who are not consistently available for this purpose. ❑ Significant mill resources are spent following up on non-returned forms. ❑ Over the past five fiscal years, approximately 15 percent of *Mill Assessment Quarterly Reports* forms are not returned to the DPR, all of which require follow-up effort by staff. ❑ Over the past five fiscal years, approximately 35 percent of *Mill Assessment Quarterly Reports* forms are returned with zero sales, which may require follow up effort by staff. ❑ Between the 2nd quarter 1999 and 1st quarter 2000, mill staff generated $150,000 in mill revenue from follow up efforts (i.e., including approximately 400 non-returned form letters and 100 final notification letters).		P12. Collect the mill assessment twice per year rather than quarterly P13. Reorganize mill assessment staff P14. Follow-up with three progressively more stringent letters to all registrants, dealers, and brokers with a mill payment compliance problem
5. Limited visibility of mill process within the DPR	❑ The relevance of the mill assessment collection process to the Department is not highly visible.		P15. Prepare a mill assessment status report on a biannual basis to keep the DPR aware of sales data, audit findings, and other management information
6. No ability to query pounds sold data	❑ Stakeholders would like to, but currently are not provided access to pounds sold data.		EG4. Provide Internet access and query capabilities to pounds sold data

Observation	Today's Performance	Gap	Improvement Opportunities
6. ***(continued)***	❑ The DPR currently generates two "pounds sold" reports: one is a confidential report for internal use only (listing all active ingredients), and the second protects confidential product information for those products with three or fewer registrants. The second report is available in hard copy upon request by stakeholders (without query access to the actual data).		
7. **Software applications and database**	❑ A number of upgrades and improvements to applications and databases are required that would help staff deliver services and information more efficiently and effectively. These include modifications already documented by the DPR and those identified during the preparation of this report. ❑ Staff must manually tally some figures on their quarterly reporting forms, a capability that could be performed by the mill assessment application and database. ❑ The DPR cannot automatically generate a single problem letter to registrants, dealers, or brokers on non-returned forms for multiple quarters.		IT1. Develop and implement a project plan (tasks, resources, schedule, and responsibilities) to improve the mill assessment database IT2. Use one database of current registrants and one database of current dealers and brokers for mailing addresses

Short Term
(higher priority to BPG)

1. Make current prioritization transparent, update information quarterly, if necessary, and provide on Web
2. Develop instruction manual with checklist for applicants:
   - ❑ Provide help in determining "completeness" of application
   - ❑ Analyze business process regarding completeness review
   - ❑ Develop flow chart/decision tree
3. Provide internal web access to evaluation reports

Long Term
(lower priority to BPG)

4. Provide access to registration tracking information and evaluation reports.
5. Allow electronic submission of application, scientific data, and product label:
   - ❑ Standardize inputs from registrant
   - ❑ Utilize models already in place at U.S. EPA and Health Canada's Pest Management Regulatory Agency (PMRA)
6. Simultaneously route registration submissions to appropriate evaluation stations
7. Survey industry and DPR staff for suggestions regarding improvements and solutions
8. Send letter to applicants to confirm receipt by DPR of any submission (not just submissions with data)

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Improvement	Description
P15. Eliminate unnecessary license renewal activities *(This recommendation is identified as the 15th pesticide registration process improvement.)*	Eliminate any licensing renewal activity that does not add value to the registrant. The objective is to reduce the cycle time and staff hours required to process license renewals. Registration specialists and branch management will need to change existing practices that lead to a number of these non value added activities. The following are activities that the DPR should eliminate: ❑ Requesting that all first and second level Registration Branch supervisors review, comment, and return the annual form letter that the DPR will include its mailing of all Application for Renewal forms ❑ Physically copying and distributing the renewal notice form letter for review. Instead the DPR should route via e-mail ❑ Debating minor issues on form letter, such as placement of the DPR's new address ❑ Delaying the mailing of an Application for Renewal because the company has one or more conditionally registered products. If a company has one or more conditionally registered products, the DPR holds up mailing the renewal notice of all that company's fully registered products, as well as the renewal notices to any company with a sub registration for the same product. Instead, the DPR should modify the licensing/renewal database and require that registration specialists update all conditionally registered products to the database prior to generating the annual mass mailings. Other options are to: (1) not print any conditionally registered product on the renewal notice, or (2) print "condition not met" next to the product on the renewal notice. ❑ Remailing renewal notices because the original was returned due to an incorrect address. Instead, require registration specialists to ensure that all change of address requests to the license/renewal database are made prior to generating the annual mass mailings. ❑ Typing (using a typewriter) the amount received from the registrant onto the Application for Renewal form in those cases where the registrant submitted one payment for more than one renewal form. Instead, ask the registrant to indicate how the single payment is to be allocated among the products listed on the multiple renewal forms returned, and indicate which product licenses should not be renewed if less than the full amount due is not paid.

Improvement	Description
P15. Eliminate unnecessary license renewal activities *(This recommendation is identified as the 15th pesticide registration process improvement.)*	❑ Recording paid license renewals to a manual log. This is the third time this event is recorded by the DPR (staff also records this event to the license/renewal database and to an accounting log of receipts). ❑ Comparing the renewed license printed from the licensing/renewal database with the returned Application for Renewal form. Instead, ensure that any changes the registrant indicated on the renewal form are correctly entered into the database. ❑ Preparing mailing labels for license mailings requiring odd-size envelopes. Instead, repair the form letter sent with renewed licenses so that a standard window envelope can be used (rather than the odd-size envelopes). ❑ Printing three copies of the license for DPR files (one to the licensing binders, one to the label resource center, and one to enforcement binders). All licensed products are contained in the licensing/renewal database. This will require at least one modification to the database. The date that the DPR records a product name change should be added as a data element. ❑ Handwriting updates and changes to the hardcopy license, and typing (using a typewriter) revised licenses initiated by a company name change. These "updates" include changes of address, conditionally registered products becoming fully registered, and products transferred from one company name to a new company name. These changes are not currently made to either of the two hard copies of the same license that the DPR now maintains (label resource center and enforcement). Instead, the DPR should require that registration specialists and licensing renewal staff make all changes to the licensing/renewal database as soon as they are known. Recording all changes to a license will require that the DPR modify the licensing/renewal database to allow the DPR to track the history of changes.

Licensing and Certification License Types

Appendix E

Type	Description	License (L) or Certificate (C)	Exam		CE Requirements	Other Requirements	Application	Renewal Fee (every two years) (c)
			Laws & Regs	Specific Category				
Individual								
Agricultural Pest Control Advisor (PCA)	For a person offering a pest control recommendation on any agricultural use, who acts as an authority on any agricultural use or solicits services or sales for any agricultural use.	L	Y	At Least One	40 hrs/2 yrs. (exceptions (e))	• Minimum education level • (d)	$50 + per exam fee of$5-$15	$80
Qualified Applicator License (QAL)	For a person supervising the pesticide application (federally restricted use, in State restricted materials and/or general use) made by licensed pest control business and responsible for the safe and legal operation of the pest control business.	L	Y	At Least One	20 hrs/2 yrs. (exceptions (e) (f))		$40 + per exam fee of $5-$15 (no exam fee)	$60
Qualified Applicator Certificate (QAC)	For a person using or supervising the use of federally restricted use pesticides or State restricted materials or general use for any purpose or on any property other than that provided by the definition of "private applicator".	C	Y	At Least One	20 hrs/2 yrs. (exceptions (e) (f))		$25 + per exam fee of $5-$15	$30
Pest Control Aircraft Pilot Certificate	For a person making aerial pest control applications.	C	Y	None	20 hrs/2 yrs. (exceptions (e))	• Current FAA medical certificate card • Valid FAA pilot license • (a)	$30 + per exam fee of $5, $15	$50
Pest Control Dealer Designated Agent	For a person responsible for a pest control dealer business.	L	Y	None	None	• None	$15 + per exam fee of $15	$30
Private Applicator	For a person using or supervising the use of federally restricted use or State restricted materials for the purpose of producing an agricultural commodity on property owned or leased, or rented by him/her or his/her employer or householder.	C	Y	None	6 hrs/3 years	• Operator I.D • Site I.D.	None	None

(a) Must register in county where where they apply pesticides.
(b) Must fulfill financial responsibility requirement, specify worker's compensation insurance carrier, provide fictitious business statement, and provide certificate of good standing (for corporations).
(c) A $10 late fee is assessed if renewal application not post marked by December 31 of year the license/certificate expires.
(d) Must register in county where they make agricultural use pest control recommendations
(e) Section 6511 CE requirements (f)(g)
(f) Section 6511 CE requirements (c) (d)

Type	Description	License (L) or Certificate (C)	Exam		CE Requirements	Other Requirements	Application	Renewal Fee (every two years) (c)
			Laws & Regs	Specific Category				
Business								
Maintenance Gardener Pest Control Business	For a person who performs pest control incidental to their maintenance gardener work for hire as a business.	L	N/A	N/A	N/A	• (a) • (b)	$50	$100
Pesticide Broker	For any person, whether inside or outside of California, engaging in the sale or distribution of pesticides for agricultural use in California.	L	N/A	N/A	N/A	• Have a pesticide broker license for each location. • (b) (without financial responsibility requirement)	$100 + $50/branch	$200 + $100/ branch
Pest Control Business	For a person engaging in pest control for hire (advertises, solicits, or operates as a pest control business).	L	N/A	N/A	N/A	• At least one person holds a QAL. • (a) • (b)	$100 + $50/branch	$200 + $100/ branch
Pest Control Dealer	For a pesticide retailer who sells agricultural use or dual use pesticide products to users (also as specified in FAC 11407(b), (c), and (d)).	L	N/A	N/A	N/A	• At least one person holds a designated agent license, PCA license, aircraft pilot certificate, or QAL. • (b) (without financial responsibility requirement)	$100 + $50/branch	$200 + $100/ branch

(a) Must register in county where where they apply pesticides.
(b) Must fulfill financial responsibility requirement, specify worker's compensation insurance carrier, provide fictitious business statement, and provide certificate of good standing (for corporations).
(c) A $10 late fee is assessed if renewal application not post marked by December 31 of year the license/certificate expires.
(d) Must register in county where they make agricultural use pest control recommendations
(e) Section 6511 CE requirements (f)(g)
(f) Section 6511 CE requirements (c) (d)

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Issue	Improvement Requirements [a]
I. Data Collection	
A. PUR regulations and requirements	
1. Unclear regulations	2
2. Enforcement letters not unified into one document	1
3. Inconsistency among counties	1
4. Counties can re-use grower_ids	1
B. General crop category vs. specific crop	
1. Qualifier codes	1, 5, 6
2. Planting sequence	1, 5, 6
C. Site location ID	
1. Require all reports of different applications to one field in a year to use the same site_loc_id	1
D. Acres treated	
1. Spot treatments	1, 5
2. Strip/band treatments	1, 5
E. Acres planted	1, 6
F. Number of applications not consistently reported in the monthly summary reports	1
G. Reporting amount, area, or volume treated in commodity fumigation	1, 5
H. Amount of product used: product vs. diluted amount	1, 4, 5
I. PLSS reporting errors	7
II. Data Quality	
A. Data validation at CAC offices (or field level)	7
B. Poor data entry screen design	7
C. Illegible PUR forms	7
D. Duplicate submissions or data entry	7
E. Lack of error corrections	7
F. Convert amount used to either pounds or gallons	7

(a) Improvement Requirements:

1. New/amend policy
2. New/amend regulation
3. New/amend legislation
4. Change/expand label database
5. Change/expand the PUR program
6. Change/expand the permit program
7. Change/add technology

May2000 PUR Users Conference

Issue	Improvement Requirements [a]
III. Data Access	
A. Data formats	
1. Fixed field file structure on CD-ROM can be problematic	7
2. Provide data as an Oracle dump file	7
B. Incomplete technical documentation	
1. Data dictionary with informational notes	7
2. Example SQL and PL/SQL code	7
C. Limited summary statistical data available	
1. Map on watershed basis using GIS	7
2. Be able to sort lists on the Web site	7
D. Active ingredient names	
1. Inconsistent names in various databases (DPR, US/EPA, USDA)	4
2. Specific v. more general names (e.g. 2,3-D vs. list of all the different esters and salts of 2,4-D)	4, 7
3. Categories for the different kinds of oils	4
4. Include trade names	
E. Crop names: inconsistent names in various databases	
F. Adjuvant and inert ingredient reporting	
G. Inappropriate precision in reports	
H. Data integration: link the PUR with other databases (e.g., DPR's Illness Reporting System)	
1. Provide better links in the data set to information needed for modeling, e.g., environmental half lives	7
2. Connect use and permit data	1, 7
3. Identify toxicity category (e.g., carcinogens, etc.)	4, 7
4. Relate to residue monitoring data at the field level	1, 7
5. Relate sales data to use data	7
I. Allow growers to view a history of their past use	7
J. Release PUR data monthly	1
K. Do not eliminate all outliers	1

(a) Improvement Requirements:

1. New/amend policy
2. New/amend regulation
3. New/amend legislation
4. Change/expand label database
5. Change/expand the PUR program
6. Change/expand the permit program
7. Change/add technology

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Issue	Improvement Requirements [(a)]
IV. Additional Data Needs	
A. Target pests	
1. Categorize target pests	1, 2, 3, 5, 7
B. Date crop planted	1, 2, 3, 5, 7
C. Date crop harvested	1, 2, 3, 5, 7
D. Acres harvested	1, 2, 3, 5, 7
E. Crop yield	1, 2, 3, 5, 7
F. Additional site information (change monthly reporting to site specific)	
1. Schools, day-care centers	1, 2, 3, 5, 7
2. Federal land	1, 2, 3, 5, 7
3. Rights-of-way	1, 2, 3, 5, 7
4. Water bodies	1, 2, 3, 5, 7
5. Indian tribal lands	1, 2, 3, 5, 7
6. Homeowners	1, 2, 3, 5, 7
7. Farm animals	1, 2, 3, 5, 7
8. Institutions	1, 2, 3, 5, 7
9. Organic fields	1, 2, 3, 5, 7
10. GM crops	1, 2, 3, 5, 7
11. Hospitals	1, 2, 3, 5, 7
12. Proximity to sensitive sites, e.g., schools, organic fields, etc.	1, 2, 3, 5, 7
13. Senior care centers	1, 2, 3, 5, 7
14. Golf courses	1, 2, 3, 5, 7
G. Identify cancellations of chemical or chemical/commodity combinations	4, 5, 7
H. Label rate	4, 5, 7
I. Pesticide type (insecticide, herbicide, etc. and class (OP, carbamate, etc.)	4, 5, 7
J. Identify section 18 applications	4, 5, 7
K. Geography: link PUR data to satellite imagery, aerial photography, and land use survey data sets	7
L. Identify applicator (PCO) that made the application and PCA affiliation	1, 5
M. Collect pesticide sales data by county	1, 2, 3, 7
N. Collect more information on structural and industrial uses	1, 2, 3, 5, 7
O. Identify genetically modified organisms (GMOs)	1, 2, 3, 5

(a) Improvement Requirements:

1. New/amend policy
2. New/amend regulation
3. New/amend legislation
4. Change/expand label database
5. Change/expand the PUR program
6. Change/expand the permit program
7. Change/add technology

Issue	Improvement Requirements [a]
V. Miscellaneous	
A. Ongoing compliance monitoring	1
B. Errors in sales database	1
C. Label database	
1. Errors in percent AI and specific gravity	1
2. Crop names on labels	1
3. Maximum label rates	4
D. PUR error reporting and correction procedures	
1. Procedure for reporting errors	1

(a) Improvement Requirements:

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